REMARKS

Reconsideration and allowance are respectfully requested.

Claims 1, 5-12, 16-22, and 26-34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,115,074 to Ozkan, et al. ("Ozkan"). Claims 2-4, 13-15, and 23-25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ozkan in view of U.S. Patent No. 6,675,385 to Wang ("Wang").

Applicant respectfully traverses all rejections, for the reasons discussed below.

Independent Claim 1

Independent claim 1 recites accessing a database that comprises the following information items: a plurality of service identifiers identifying a plurality of provided services, and a plurality of sets of tuning parameters, each of the sets being associated with a respective one of the plurality of service identifiers, wherein the database comprises at least two identical service identifiers.

As correctly indicated by the Office Action, Ozkan fails to teach or suggest a database having at least two identical service identifiers, as claimed. Rather, the Office Action alleges that it would have been obvious to use two identical service identifiers so as to store tuning parameters from various different network sources that will be played on the end user device.

Applicants respectfully disagree, because such a modification of Ozkan would not have worked. More specifically, if a plurality of network sources were to have been combined so as to be received by the same receiver, then storing at least two identical service identifiers would have been incompatible with the system of Ozkan.

In Ozkan, groups of channels ("sub-channels" using Ozkan's terminology) are associated with the same broadcaster. Each sub-channel is identified by a first identification number (element 300 in Fig. 3) indicating its group, and a second identification number (element 305 in Fig. 3) indicating its identity within the group. As stated in Ozkan, "the second identification number … identifies a sub-channel corresponding to a specific service within a group of services provided by a broadcaster." (Ozkan, col. 6, lines 27-31).

Therefore, if Ozkan were somehow to use at least two identical service identifiers (as in claim 1), then a serious problem would arise in that the user would not be able to access the

desired one of at least two identical services (i.e., both being the "specific service" as indicated in Ozkan).

Moreover, the data structure presented in Fig. 3 of Ozkan (see elements 300 and 305) clearly would not even have allowed the system to access a particular one of at least two identical service identifiers."

For at least these reasons, Ozkan is incompatible with using at least two identical service identifiers as claimed.

In contrast, the presence of the two identical service identifiers, as described in Applicant's own specification, may solve the problem where multiple different service provider networks are available:

> As already mentioned, a user can have access to more than one service provider network. Examples of such networks are satellite, cable and terrestrial networks. Thus, different users can have access to different networks. This means that different tuning parameters for different types of tuners are used by different users watching for example the same TV programme. This poses a special problem for those providing information regarding TV channels because the information needed is different for different users.

(Specification, p. 2, line 24, to p. 3, line 2). While Ozkan presents a number of different broadcast systems (col. 2, line 65 to col. 3, line 9), there is no teaching or suggestion of such a problem in the prior art. Hence, there is no teaching to reach the solution of the claimed invention.

For at least these reasons, it is submitted that claim 1 is allowable over Ozkan.

Dependent Claims 6, 17, 27, and 34

Claim 6 recites that retrieving a set of tuning parameters comprises selecting the most recently used of the at least two identical service identifiers. In rejecting this claim, the Office Action refers to Ozkan at col. 6, lines 11-41. This portion of Ozkan discloses that individual program channels are allocated both a first major identification number and a second sub-identification number. Each program is thus identified by a combination of the first and second identification numbers. However, this is not relevant to selecting the most recently used of at least two identical service identifiers, as claimed. Nor does any other portion of Ozkan teach or suggest this feature. In addition, Wang fails to overcome this deficiency of Ozkan.

Applicant explained this in the previous Amendment filed September 24, 2007 (the identical rejection was applied, so Applicant's argument was not moot). However, the Examiner has neither acknowledged nor attempted to rebut this argument. Applicant therefore respectfully requests on the record a specific response to the above argument regarding claim 6.

Claims 17, 27, and 34 are also allowable for at least similar reasons as discussed above with regard to claim 6.

Remaining Independent Claims

It is submitted that the remaining independent claims are also allowable over Ozkan for at least similar reasons as discussed above with regard to claim 1. Moreover, Wang fails to overcome the deficiencies of Ozkan, as previously discussed.

Remaining Dependent Claims

The remaining dependent claims are also allowable by virtue of depending from allowable independent claims, and further in view of the additional features recited therein. Moreover, the attempted addition of Wang does not overcome the deficiencies in Ozkan as previously discussed.

Conclusion

All rejections having been addressed, Applicant respectfully submits that the instant application is in condition for allowance, and solicit prompt notification of the same. If the Examiner has any questions, the Examiner is invited to contact the undersigned at the number below.

Respectfully submitted,

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